

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BRATTA TO  
NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORIES  
(NPMHU/USPS-T5—2, 3, AND 5)  
(March 9, 2012)**

United States Postal Service witness Bratta (USPS-T-5) responds to the above-listed interrogatories of the National Postal Mail Handlers Union, dated February 24, 2012. Each interrogatory is stated verbatim and followed by the response. Interrogatories NPMHU/USPS-T5—1 and –6 have been redirected to the Postal Service for an institutional response. The response to NPMHU/USPS-T5—4 is forthcoming.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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March 9, 2012

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BRATTA TO  
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**NPMHU/USPS-T5-2** Referring to your response to PR/USPS-T4-4(h), redirected from witness Neri, you state that “[p]reventative maintenance, corrective maintenance, and operational maintenance increase as machines run for longer periods” and reference Library Reference 59 for more information.

(a) Please state whether there is any formula or formula for estimating the increase(s) in maintenance costs relative to increase in machine run times. If so, please provide that formula(s) and explain how it has been applied in this case.

(b) If the answer to (a) is no, please explain how the Postal Service has accounted for these increased costs in estimating the costs and savings associated with the redesigned network.

(c) Please explain how Library Reference 59 explains or quantifies the increase in maintenance costs associated with increased run time, including in your answer specific reference to specific documents within Library Reference 59.

**RESPONSE:**

(a-c) Maintenance resources are allocated according to the guidelines described in USPS Library Reference USPS-LR-N2012-1/59 and file

“WHEP\_Staffing\_MMO\_074\_00.pdf” included in USPS Library Reference USPS-LR-N2012-1/32. These guidelines will continue to apply if the changes proposed in this docket are implemented. As equipment run times increase, maintenance will increase consistent with the guidelines. For example, the file titled “WHEP\_Staffing\_MMO\_074\_00.pdf” contains information regarding the workhours for each piece of equipment maintained by the Postal Service.

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**NPMHU/USPS-T5-3** Referring to your response to APWU/USPS-T5-2, you state that the “actual number of [mail processing equipment] units depends on the results of the AMP studies and implementation of the Network Rationalization Initiative.” Please provide the expected number of each type of mail processing equipment after network consolidation, given and assuming the implementation of the AMP decisions announced by the Postal Service on February 23, 2012, and published at <http://about.usps.com/what-we-are-doing/our-futurenetwork/assets/pdf/communications-list-022212.pdf>.

**RESPONSE:**

Because the AMP review process is not complete, and some AMPs are still under review and evaluation, an accurate count of the mail processing equipment that will compose the Postal Service network if the changes proposed in this docket are implemented cannot be provided. But witness Rosenberg (USPS-T-3) has informed me that the projection of mail processing equipment below is based on currently available information. Note that the projection includes non-AMP and stand-alone sites, and thus the sum of equipment in the AMP packages will not equal the projection presented below.

Equipment	Amount	Comments
AFCS	691	
AFSM-ALL	469	
APPS	63	APPS machines not included here are located at NDCs (11 machines)
CIOSS	171	
DBCS	2698	
DIOSS	766	
FSS	91	FSS machines not included here are located at NDCs (9 total machines)
SPBS	188	APPS machines not included here are located at NDCs (11 machines)

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**NPMHU/USPS-T5-5** Referring to the results of the AMP decisions announced by the Postal Service on February 23, 2012, and published at <http://about.usps.com/what-we-are-doing/our-futurenetwork/assets/pdf/communications-list-022212.pdf>:

- a) What costs are anticipated to be incurred in facilities and maintenance where a facility loses its originating mail processing, but not its other functions?
- b) What costs are anticipated to be incurred in facilities and maintenance where a facility loses its destinating mail processing, but not its other functions?
- c) What costs are anticipated to be incurred in facilities and maintenance where a facility loses its originating and destinating mail processing, but not its other functions?

**RESPONSE:**

My testimony does not estimate costs. The AMP packages contained in USPS

Library Reference USPS-LR-N2012-1/NP12 reflect the variations described in this interrogatory.